

Lexi J. Hazam (SBN 224457)
lhazam@lchb.com
LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-100

Christopher A. Seeger (*pro hac vice*)
cseeger@seegerweiss.com
SEEGER WEISS, LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
Facsimile: (973) 679-8656

Previn Warren (*pro hac vice*)
pwarren@motleyrice.com
MOTLEY RICE LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: (202) 386-9610
Facsimile: (202) 232-5513

Plaintiffs' Co-Lead Counsel

Jennie Lee Anderson (SBN 203586)
jennie@andrusanderson.com
ANDRUS ANDERSON LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: (415) 986-1400
Facsimile: (415) 986-1474

Plaintiffs' Liaison Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*H.D. filed on behalf of minor J.D. v. Meta
Platforms, Inc., et al., 4:23-cv-01425;*

*Jeffrey Barnes, filed on behalf of minor
A.B. v. Meta Platforms, Inc., et al., 4:23-*

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS IN SUPPORT OF PLAINTIFFS'
SECOND CONSOLIDATED EX PARTE
APPLICATION FOR APPOINTMENT OF
GUARDIANS AD LITEM**

1 cv-01422;

2 *Richard Neal Booker, individually and on*
 3 *behalf of their minor child S.B. v. Meta*
 4 *Platforms, Inc., et al.*, 4:23-cv-01537;

5 *C. G. filed on behalf of minor A.G. v. Meta*
 6 *Platforms, Inc., et al.*, 4:23-cv-01568;

7 *N.K. filed on behalf of minor S.K. v. Meta*
 8 *Platforms, Inc., et al.*, 4:23-cv-01584;

9 *M.M., filed on behalf of minor B.M. v. Meta*
 10 *Platforms, Inc., et al.*, 4:23-cv-01615;

11 *C.S., filed on behalf of minor J.S. v. Meta*
 12 *Platforms, Inc., et al.*, 4:23-cv-01569;

13 *S.S. filed on behalf of minor M.S. v. Meta*
 14 *Platforms, Inc., et al.*, 4:23-cv-02024; and

15 *K.C. filed on behalf of minor M.C. v. Meta*
 16 *Platforms, Inc., et al.*, 4:23-cv-01465

17 Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for
 18 administrative relief to file under seal the individual *Ex Parte* Applications for Appointment of
 19 Guardian *Ad Litem* (“Applications”) described in Plaintiffs’ Second Consolidated *Ex Parte*
 20 Application for Appointment of Guardians *Ad Litem* (“Consolidated *Ex Parte* Application”) and
 21 attached as Exhibits 1 to 9 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’
 22 Second Consolidated *Ex Parte* Application (“Anderson Declaration”).

23 The Applications for which sealing is sought are:

- 24 • *H.D. filed on behalf of minor J.D. v. Meta Platforms, Inc., et al.*, 4:23-cv-01425
 25 (Exhibit 1);
- 26 • *Jeffrey Barnes, filed on behalf of minor A.B. v. Meta Platforms, Inc., et al.*, 4:23-cv-
 27 01422 (Exhibit 2);
- 28 • *Richard Neal Booker, individually and on behalf of their minor child S.B. v. Meta*
Platforms, Inc., et al., 4:23-cv-01537 (Exhibit 3);
- *C. G. filed on behalf of minor A.G. v. Meta Platforms, Inc., et al.*, 4:23-cv-01568

(Exhibit 4);

- *N.K. filed on behalf of minor S.K. v. Meta Platforms, Inc., et al.*, 4:23-cv-01584

(Exhibit 5);

- *M.M. filed on behalf of minor B.M. v. Meta Platforms, Inc., et al.*, 4:23-cv-01615

(Exhibit 6);

- *C.S., filed on behalf of minor J.S. v. Meta Platforms, Inc., et al.*, 4:23-cv-01569

(Exhibit 7);

- *S.S. filed on behalf of minor M.S. v. Meta Platforms, Inc., et al.*, 4:23-cv-02024

(Exhibit 8); and

- *K.C. filed on behalf of minor M.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-01465

(Exhibit 9).

This motion is accompanied by a proposed order and the Declaration of Jennie Lee Anderson In Support of Plaintiffs’ Administrative Motion to File Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Second Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Decl. ISO Admin Motion”) pursuant to Civil Local Rules 7-11 and 7-12. *See* Civ. L. R. 79-5(c).

This Court previously considered and finding good cause granted Plaintiffs’ request to seal applications for guardians *ad litem* in this case. ECF No. 16.

Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants on April 26, 2023, to stipulate that these Exhibits may be filed under seal. Liaison Counsel for Defendants confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶ 5.

For the reasons set forth above, Plaintiffs respectfully request that the Court enter the [Proposed] Order Granting Plaintiffs’ Administrative Motion to File Under Seal Exhibits In Support of Plaintiffs’ Second Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*.

Dated: April 26, 2023

Respectfully submitted,

ANDRUS ANDERSON LLP

/s/Jennie Lee Anderson

Jennie Lee Anderson

jennie@andrusanderson.com

155 Montgomery Street, Suite 900

San Francisco, CA 94104

Telephone: (415) 986-1400

Facsimile: (415) 986-1474

Plaintiffs' Liaison Counsel

Lexi J. Hazam (SBN 224457)

lhazam@lchb.com

**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**

275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

Telephone: (415) 956-1000

Facsimile: (415) 956-100

Christopher A. Seeger (*pro hac vice*)

cseeger@seegerweiss.com

SEEGER WEISS, LLP

55 Challenger Road, 6th Floor

Ridgefield Park, NJ 07660

Telephone: (973) 639-9100

Facsimile: (973) 679-8656

Previn Warren (*pro hac vice*)

pwarren@motleyrice.com

MOTLEY RICE LLC

401 9th Street NW, Suite 630

Washington, DC 20004

Telephone: (202) 386-9610

Facsimile: (202) 232-5513

Plaintiffs' Co-Lead Counsel

JOSEPH G. VANZANDT

BEASLEY ALLEN CROW METHVIN

PORTIS & MILES, P.C.

234 COMMERCE STREET

MONTGOMERY, AL 36103

Telephone: 334-269-2343

joseph.vanzandt@beasleyallen.com

1 EMILY C. JEFFCOTT
2 **MORGAN & MORGAN**
3 220 W. GARDEN STREET, 9TH FLOOR
4 PENSACOLA, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

5 RON AUSTIN
6 **RON AUSTIN LAW**
7 400 Manhattan Blvd.
8 Harvey LA, 70058
Telephone: (504) 227-8100
raustin@ronaustinlaw.com

9 MATTHEW BERGMAN
10 GLENN DRAPER
11 **SOCIAL MEDIA VICTIMS LAW CENTER**
12 821 SECOND AVENUE, SUITE 2100
13 SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

14 JAMES J. BILSBORROW
15 **WEITZ & LUXENBERG, PC**
16 700 BROADWAY
17 NEW YORK, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com

18 PAIGE BOLDT
19 **WATTS GUERRA LLP**
20 4 Dominion Drive, Bldg. 3, Suite 100
21 San Antonio, TX 78257
T: 210-448-0500
PBoldt@WattsGuerra.com

22 THOMAS P. CARTMELL
23 **WAGSTAFF & CARTMELL LLP**
24 4740 Grand Avenue, Suite 300
25 Kansas City, MO 64112
T: 816-701 1100
tcartmell@wcllp.com

26 JAYNE CONROY
27 **SIMMONS HANLY CONROY, LLC**
28 112 MADISON AVE, 7TH FLOOR

1 NEW YORK, NY 10016
2 Telephone: 917-882-5522
3 jconroy@simmonsfirm.com

4 CARRIE GOLDBERG
5 **C.A. GOLDBERG, PLLC**
6 16 Court St.
7 Brooklyn, NY 11241
8 T: (646) 666-8908
9 carrie@cagoldberglaw.com

10 KIRK GOZA
11 **GOZA & HONNOLD, LLC**
12 9500 Nall Avenue, Suite 400
13 Overland Park, KS 66207
14 T: 913-451-3433
15 kgoza@gohonlaw.com

16 SIN-TINY MARY LIU
17 **AYLSTOCK WITKIN KREIS & OVERHOLTZ,**
18 **PLLC**
19 17 EAST MAIN STREET, SUITE 200
20 PENSACOLA, FL 32502
21 Telephone: 510-698-9566
22 mliu@awkolaw.com

23 ANDRE MURA
24 **GIBBS LAW GROUP, LLP**
25 1111 BROADWAY, SUITE 2100
26 OAKLAND, CA 94607
27 Telephone: 510-350-9717
28 amm@classlawgroup.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333
Facsimile: (818) 986-9698
rtellis@baronbudd.com

1 dfernandes@baronbudd.com

2 ALEXANDRA WALSH
3 **WALSH LAW**
4 1050 Connecticut Ave, NW, Suite 500
5 Washington D.C. 20036
6 T: 202-780-3014
7 awalsh@alexwalshlaw.com

8 MICHAEL M. WEINKOWITZ
9 **LEVIN SEDRAN & BERMAN, LLP**
10 510 WALNUT STREET
11 SUITE 500
12 PHILADELPHIA, PA 19106
13 Telephone: 215-592-1500
14 mweinkowitz@lfsbalw.com

15 DIANDRA "FU" DEBROSSE ZIMMERMANN
16 **DICELLO LEVITT**
17 505 20th St North
18 Suite 1500
19 Birmingham, Alabama 35203
20 Telephone: 205.855.5700
21 fu@dicellolevitt.com

22 ROBERT H. KLONOFF
23 **ROBERT KLONOFF, LLC**
24 2425 SW 76TH AVENUE
25 PORTLAND, OR 97225
26 Telephone: 503-702-0218
27 klonoff@usa.net

28 HILLARY NAPPI
29 **HACH & ROSE LLP**
30 112 Madison Avenue, 10th Floor
31 New York, New York 10016
32 Tel: 212.213.8311
33 hnappi@hrsclaw.com

34 ANTHONY K. BRUSTER
35 **BRUSTER PLLC**
36 680 N. Carroll Ave., Suite 110
37 Southlake, TX 76092
38 (817) 601-9564
39 akbruster@brusterpllc.com

40 FRANCOIS M. BLAUDEAU, MD JD FACHE
41 FCLM

**SOUTHERN INSTITUTE FOR MEDICAL AND
LEGAL AFFAIRS**

2762 B M Montgomery Street, Suite 101
Homewood, Alabama 35209
T: 205.564.2741
francois@southernmedlaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

Attorneys for Plaintiffs